

Erwin Chemerinsky (*pro hac vice*)  
echemerinsky@law.berkeley.edu  
Claudia Polsky (CA Bar No. 185505)  
cpolsky@law.berkeley.edu  
U.C. BERKELEY SCHOOL OF LAW  
Law Building  
Berkeley, CA 94720-7200  
Telephone: 510.642.6483

Elizabeth J. Cabraser (CA Bar No. 83151)  
ecabraser@lchb.com  
Richard M. Heimann (CA Bar No. 63607)  
rheimann@lchb.com  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Telephone: 415.956.1000

Anthony P. Schoenberg (CA Bar No. 203714)  
tschoenberg@fbm.com  
Linda S. Gilleran (CA Bar No. 307107)  
lgilleran@fbm.com  
FARELLA BRAUN + MARTEL LLP  
One Bush Street, Suite 900  
San Francisco, CA 94104  
Telephone: 415. 954.4400

*Attorneys for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

NEETA THAKUR, *et al.*,  
Plaintiffs,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,  
Defendants.

Case No. 3:25-cv-4737

**DECLARATION OF ELIZABETH J.  
CABRASER IN SUPPORT OF  
MOTION FOR PRELIMINARY  
INJUNCTION AND PROVISIONAL  
CLASS CERTIFICATION AS TO THE  
DEPARTMENT OF HEALTH AND  
HUMAN SERVICES / NATIONAL  
INSTITUTES OF HEALTH**

1  
2 I, Elizabeth J. Cabraser, declare as follows:

3 1. I am an attorney admitted to practice in the state of California. I am a partner of  
4 Lieff Cabraser Heimann & Bernstein LLP (“LCHB”). I respectfully submit this declaration in  
5 support of Plaintiffs’ Motion For Preliminary Injunction And Provisional Class Certification As  
6 To Department of Health and Human Services / National Institutes of Health. I have personal  
7 knowledge of the facts set forth in this declaration, and could testify competently to them if called  
8 upon to do so.

9 2. Attached as **Exhibit A** is a true and correct copy of the July 31, 2025 “Notice of  
10 Award Suspension” letter sent from NIH Acting Deputy Director for Extramural Research, Jon  
11 Lorsch, to University of California Los Angeles Chancellor, Dr. Julio Frenk.

12 3. Attached as **Exhibit B** is a true and correct copy of an exemplar individual NIH  
13 grant termination letter that Defendants produced to Plaintiffs on June 17, 2025.

14 I declare under penalty of perjury under the laws of the State of California and the United  
15 States that the foregoing is true and correct.

16  
17 Executed this 29th day of August, 2025, in San Francisco.

18  
19 /s/Elizabeth Cabraser

20 Elizabeth Cabraser  
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